

To: [REDACTED] (ENV); [REDACTED] (ENV); CIOBANU-DORDEA Aurel (ENV)

Subject: Meeting RECHARGE 20240111

Dear all,

Please find below notes from the meeting with RECHARGE on 11/1/2024, that will be filed on Ares.

Meeting with RECHARGE: Subject: Batteries (carbon footprint, PFAS and recycling)

Day and time: 11/1/2024, 09:30 – 10:00 **Location:** BREY2

Participants: European Commission (Aurel Ciobanu-Dordea, [REDACTED], [REDACTED], [REDACTED]) and RECHARGE ([REDACTED], [REDACTED], [REDACTED], [REDACTED])

Overview

- **RECHARGE consortium overview:** A representative from the consortium RECHARGE initially provided an overview of the various trade bodies representing the battery industry. It explained that RECHARGE's scope was extensive, encompassing mining materials, chemicals, battery component manufacturers, and entities involved in bringing batteries to the market. The scope also included companies from the IT and automotive sectors, leading to its identification as a value chain association.

Carbon footprint methodology

- **Carbon footprint calculation methodologies:** The discussion covered methodologies for calculating the carbon footprint. A key concern raised was the potential for a significant margin of error or uncertainty in results when using theoretical secondary data, which may not be universally applicable across EU countries and might not reflect market differences. The suggestion from RECHARGE was to make the use of primary data mandatory in these calculations, where possible, to enhance the accuracy of calculations. It was noted that the due diligence under the Battery Regulation should support obtaining primary data for carbon footprint calculations. However, challenges were acknowledged, as primary data might not be available for all industry aspects.

PFAS restriction proposal

- **RECHARGE sector priority in PFAS restriction proposal:** RECHARGE requested that its sector be considered a priority in the evaluation of technical inputs for the PFAS restriction proposal. They emphasised their role in developing a 'new' industry rather than just fostering its growth and highlighted ongoing considerations for investments in gigafactories. Concerns were expressed about investor reluctance due to the extended waiting time for the publication of opinions on PFAS. Notably, it was argued that most emissions from batteries could be controlled, and consumer preference for the best batteries in electric vehicles was emphasised as a barrier to finding sufficiently performing alternatives in this sector.

- **Technical contribution update:** The Commission suggested that RECHARGE could provide an update of their contribution submitted during the ECHA consultation. The update should include the state of play for alternatives within their sector, e.g. if any developments had taken place. The timing for this update should align with the second consultation, occurring after the publication of opinions by RAC and SEAC.
- **Ensuring PFAS-Free imported batteries:** A discussion ensued on how the Commission could ensure that imported batteries were PFAS-free. Concerns were raised about the inefficiency of market surveillance and the ongoing difficulty in identifying PFAS in batteries.

Recycling

- **Dedicated meeting on battery recycling:** It was agreed that another separate meeting would be organised specifically to discuss the recycling of batteries.